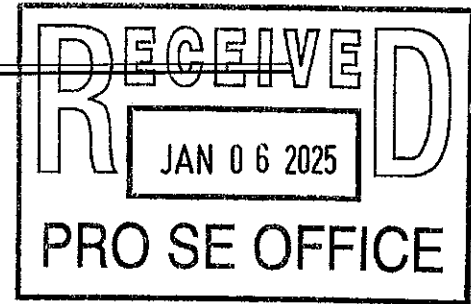


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK



Ephesian Johnny Franklin

Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

-against-

**COMPLAINT**

Shawn Corey Carter

Do you want a jury trial?  
☐ Yes ☒ No

Beyonce Giselle Knowles

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

## I. BASIS FOR JURISDICTION

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☐ Federal Question

☒ Diversity of Citizenship

### A. If you checked Federal Question

Which of your federal constitutional or federal statutory rights have been violated?

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### B. If you checked Diversity of Citizenship

#### 1. Citizenship of the parties

Of what State is each party a citizen?

The plaintiff, Ephesian Johnny Franklin, is a citizen of the State of  
(Plaintiff's name)

1318 Robin Street Apt B, Houston, Texas 77019  
(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

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If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, Shawn Corey Carter, is a citizen of the State of  
(Defendant's name)

Brooklyn, New York

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of

If the defendant is a corporation: Roc Nation Music Label

The defendant, Shawn Corey Carter, is incorporated under the laws of  
the State of New York

and has its principal place of business in the State of Brooklyn, NY

or is incorporated under the laws of (foreign state) \_\_\_\_\_

and has its principal place of business in Manhattan, New York.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

<u>Ephesian</u>	<u>J</u>	<u>Franklin</u>
First Name	Middle Initial	Last Name
<u>1318 Robin Street Apt B</u>		
Street Address		
<u>Harris County, Houston</u>	<u>Texas</u>	<u>77019</u>
County, City	State	Zip Code
<u>281-830-7815</u>	<u>ephesianfranklin4@gmail.com</u>	
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1: Shawn Carter  
 First Name Last Name  
CEO Rapper  
 Current Job Title (or other identifying information)  
540 W 26th St, New York, NY 10001  
 Current Work Address (or other address where defendant may be served)  
New York New York 10001  
 County, City State Zip Code

Defendant 2: Beyonce Knowles  
 First Name Last Name  
Pop Singer  
 Current Job Title (or other identifying information)  
1412, Broadway 24th Floor  
 Current Work Address (or other address where defendant may be served)  
New York New York 10018-9235  
 County, City State Zip Code

Defendant 3: \_\_\_\_\_  
 First Name Last Name  
 \_\_\_\_\_  
 Current Job Title (or other identifying information)  
 \_\_\_\_\_  
 Current Work Address (or other address where defendant may be served)  
 \_\_\_\_\_  
 County, City State Zip Code

Defendant 4:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

### III. STATEMENT OF CLAIM

Place(s) of occurrence: Music Video titled: "No Angel" Mac Gregor Park, 5225 Calhoun Rd, Houston, TX 77021

Date(s) of occurrence: September 11, 2024 October 19, 2013

#### FACTS:

State here briefly the FACTS that support your case. Describe what happened, how you were harmed, and what each defendant personally did or failed to do that harmed you. Attach additional pages if needed.

I'm featured in Mr. Shawn Carter wife's music video Beyonce Knowles!  
His wife took an obsession to me and displayed it in her video and also  
showcased some defaming scenes of me off guard. The time of filming  
her music video titled 'no angel' my house got fired into with children there.  
All kinds of bizarre attacks were happening to various people, the two boys  
in the scene right before the defaming scene of me reaching in my car both  
got killed. Mr. Shawn Carter started sending threats! Beyonce's mother Tina  
sent threats through rapper Paul Wall and my cousin, his assistant, Gerald Side.  
I filed numerous complaints on Mr. Carter and his wife Beyonce Knowles. He  
started putting threats in his songs to me and defaming me behind his wife  
music video. She did numerous stints with posting on Instagram next to me a  
few times. They have phone hacks and social media stalkings when my complaints  
were filed for the amount it was. I had court at the Southern District of Texas Houston  
Division against Mr. Carter and Beyonce. Every Court date or legal procedures

I took, someone would get harmed.

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#### **INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

Since I filmed Beyonce Knowles and Shawn Carter music video titled 'no angel' I had back problems, psychological harassment, defamed depression. I got some therapy, but the harassment continues. Children and various people even suffered the effects in my environment.

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#### **IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

Mr. Shawn Carter and Beyonce Knowles destroyed my houses, cars, family, and friends. All my assets was featured in that music video. My mother house which starts the music video off have all kinds of atrocious acts done to it. My 6 books including the one featured the rappers money was missing! My video footage from my Slab Car Parade stolen. Damages \$40,000,000!!

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

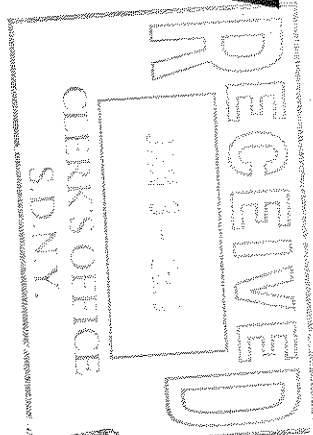
<u>January 1, 2025</u>		<u>Ephesian Franklin</u>
Dated		Plaintiff's Signature
<u>Ephesian</u>	<u>J</u>	<u>Franklin</u>
First Name	Middle Initial	Last Name
<u>1318 Robin Street Apt B</u>		
Street Address		
<u>Harris, Houston</u>	<u>Texas</u>	<u>77019</u>
County, City	State	Zip Code
<u>281-830-7815</u>	<u>ephesianfranklin4@gmail.com</u>	
Telephone Number	Email Address (if available)	

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☒ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

From: Ephesia Fraktika  
1318 Robin St Apt B  
Houston, TX 77019



*Pro Se*

Ready **P**ost

Document Mailer

10007-131688



Retail



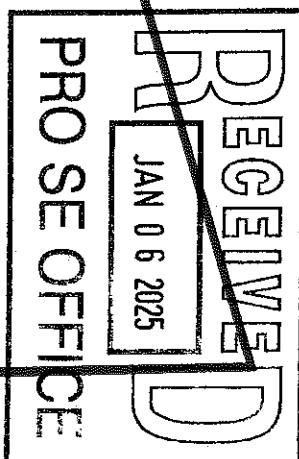
10007

RDC 99

S2324A501968-3

**\$1.29**

U.S. POSTAGE PAID  
FCM LETTER  
HOUSTON, TX 77002  
DEC 30, 2024



To: Southern District of New York

Court Clerk

500 Pearl Street

New York, NY 10007

10007-131688